

**AMERICAN  
FOREST &  
PAPER  
ASSOCIATION**

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July 22, 1997

GOVERNMENT AFFAIRS

Mr. Paul Relis, Chair  
Market Development Committee  
California Integrated Waste Management Board  
8800 Cal Center Drive, MS-22  
Sacramento, CA 95826

RE: Consideration of the Methodology and Calculation of the Preliminary 1996 and Revised 1995 California Postconsumer Paper Utilization Rate.

Dear Mr. Relis:

The American Forest & Paper Association (AF&PA) is a national trade association representing the U.S. forest products industry. The United States is the world's leading producer and consumer of forest products, a vital component of the nation's economy representing more than 8% of all U.S. manufacturing capacity. California's forest and paper industry is vital to the state's economy. It ranks in the top half of the manufacturing industries in the state, representing 5.2% of the manufacturing workforce. The industry employs 100,374 workers, with a payroll income of \$2.9 billion.

The proposed revision to the methodology for calculating the California utilization rate represents a modest improvement to the previous methodology, but still relies much too heavily on extrapolated data.

More importantly, the 50% post-consumer utilization goal set by the California Integrated Waste Management Board for the year 2000 remains highly unrealistic. A 50% post-consumer goal is tantamount to a combined pre and post-consumer goal that is substantially higher than 50%. Japan, with its tradition of recycling and high population densities, has not been able to move significantly above the 50% mark on a pre and post consumer basis, suggesting it is not practical to reach 50% relying solely on post-consumer recovered paper, which is California's plan.

If you have any questions or need more information, please feel free to contact our legislative advocate, Ms. Kathryn Lynch at (916) 443-0202.

Sincerely,



Kris Kiser, Senior Director  
Governmental & External Affairs  
American Forest & Paper Association

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cc: Market Development Committee Members, CIWMB  
California Integrated Waste Management Board Members  
Mr. Brian Foran, Secondary Materials Assistance Branch, CIWMB  
Mr. John Smith, Manager, Recycling Business Assistance Branch, CIWMB  
AF&PA California Working Group  
Ms. Kathryn Lynch, AF&PA Legislative Advocate

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